

EXHIBIT I

ANDREA FOLLETT

From: Raymond Verdi <rverdi@verdilawpc.com>
Sent: Thursday, August 28, 2025 4:54 PM
To: Thomas J. Monroe
Cc: RICHARD McCORD; ANDREA FOLLETT
Subject: Re: Fraleg Group, Inc.

External Email: Proceed with caution!

Good day,

I have received this request but have not gotten the cooperation from my client. I have contacted the principals on many occasions with no response. I will contact my client again and seek to get the documents requested as soon as practicable.

Raymond W. Verdi, Jr.
Attorney at Law
178 East Main Street
Patchogue, NY 11772
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On Thu, Aug 28, 2025 at 3:29 PM Thomas J. Monroe <tmonroe@certilmanbalin.com> wrote:

Raymond:

Please see the attached correspondence requesting Fraleg Group's production of documents requested by Chicago Title Insurance Company as well as cooperation with Chicago Title's investigation related to 116 North Walnut Street, East Orange, New Jersey.

CERTILMANBALIN

Thomas J. Monroe, Esq.

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August 28, 2025

VIA EMAIL AND REGULAR MAIL

(rverdi@verdilawpc.com)
Raymond W. Verdi, Jr., Esq.
178 East Main Street
Patchogue, New York 11772

*Re: Fraleg Group, Inc.
Chapter 7
Case No.: 22-41410-jmm*

Dear Mr. Verdi:

This firm is counsel to Richard J. McCord the appointed Chapter 7 Trustee (“Trustee”) for Fraleg Group, Inc. (the “Debtor”). On June 11, 2024, Debtor was served with a Subpoena for Rule 2004 Examination (“Subpoena”). On August 20, 2024, Debtor responded to the Subpoena and provided Debtor’s Response To Trustee’s Request For Production Of Documents which included the following documents:

- (a) Debtor’s 2020 Tax Return;
- (b) Settlement Statement related to 116 North Walnut Street, East Orange, New Jersey;
- (c) Debtor’s Schedule A/B;
- (d) Debtor’s Schedule of Creditors; and
- (e) Debtor’s office lease.

On or about December 13, 2024, Trustee submitted a Notice Of Claim to Chicago Title Insurance Company (“Chicago Title”) on behalf of Debtor under title policy number 7230600-21730738 (the “Policy”) insuring properties commonly known as 112 North Walnut Street, East Orange, New Jersey and 116 North Walnut Street, East Orange, New Jersey (the “Properties”) related to the City of East Orange’s objection to the sale of 116 North Walnut, Street. On January 28, 2025, Chicago Title accepted the tender of defense related to East Orange’s claims subject to the terms and conditions of the Policy and subject to a reservation of rights.

Chicago Title is conducting its due diligence under the Policy and investigating this matter. We are advised that during this investigation counsel for Chicago Title has contacted you and or the Debtor directly requesting the production of documents. Specifically, all documents, correspondence and communications within Debtor’s possession relating to its purchase of the Properties. To date, Debtor has not supplied the requested documents to Chicago Title.

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Pursuant to the Policy, Debtor has an obligation to cooperate with Chicago Title and produce documents within its possession. Debtor's failure to cooperate may jeopardize coverage provided under the Policy. In that regard, please note we will supply Chicago Title all documents produced by Debtor under the Subpoena, except for Debtor's 2020 tax return. Nevertheless, it is important that Debtor supply Chicago Title with the requested documents, *inter alia*, all documents, correspondence and communications within Debtor's possession relating to its purchase of the Properties.

Please take the necessary steps to comply with this request, and any additional requests made to Debtor by counsel for Chicago Title and provide the requested documentation within ten (10) days of the date of this correspondence. Failure to do so will result in the Trustee taking the necessary and appropriate actions in the United States Bankruptcy Court.

Thank you for your cooperation in this matter.

Very truly yours,

CERTILMAN BALIN ADLER & HYMAN, LLP

/S/Thomas J. Monroe

Thomas J. Monroe

cc: Joyce Davis, Esq. (via email only)

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